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July 12, 2024

VIA ECF

The Hon. Cheryl L. Pollak, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Ruiz et al v. JHDHA, Inc. et al*
Case No.: 1:23-cv-07896-JGLC

Dear Honorable Magistrate Judge Pollak:

This law firm represents Plaintiff Fredricka Brooks (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules, and the directives in Your Honor’s June 14, 2024 Status Report Order, letter respectfully serves to provide the Court with a status update in the above-referenced action.

As of the date of the filing of the previous status letter [Dckt. No. 7] Individual Defendant Karen Tapper (the “Individual Defendant”) has not provided the undersigned with the contact information of her counsel.

In light of the foregoing, Plaintiff respectfully requests an extension of time to file a further status report to, through and including, August 13, 2024. The undersigned anticipates the filing of an application for a clerk’s certificate of default judgment, in the event of the Individual Defendants’s continued non-appearance.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel